CONNELL FOLEY LLP 888 7th Avenue, Suite 3401 New York, NY 10106 (212) 262-2390 Attorneys for Plaintiff Evonik Degussa Corporation

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

INTEROCEAN COAL SALES, LDC

Plaintiff,

٧.

EVONIK TRADING GmbH, an alien corporation, EVONIK DEGUSSA CORPORATION, an Alabama corporation, EVONIK INDUSTRIES, AG, an alien corporation, and EVONIK STEAG GmbH, an alien corporation,

Defendants.

CIVIL ACTION NO. 11-civ-0940

CORPORATE DISCLOSURE STATEMENT PURSUANT TO FED.R.CIV.P. 7.1

Evonik Degussa Corporation files this Corporate Disclosure Statement consistent with the requirements of Federal Rule of Civil Procedure 7.1. Evonik Degussa Corporation is a wholly owned subsidiary of Evonik Degussa GmbH. No publicly held company owns more than 10% of its stock.

Respectfully submitted,

/s/ Patrick J. Hughes
Patrick J. Hughes
CONNELL FOLEY, LLP
888 7th Avenue, Suite 3401
New York, NY 10106
(212) 262-2390

85 Livingston Avenue Roseland, NJ 07068 (973) 535-0500